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**JOHN D. HEFFNER, PLLC**

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BY HAND

April 4, 2005

Honorable Vernon A. Williams  
Surface Transportation Board  
1925 K Street, N.W.  
Washington, D.C. 20423-0001

RE: San Pedro Railroad Operating Company, LLC—Abandonment, STB Docket No. AB-441  
(Sub-No. 4X), System Diagram Map.

Dear Mr. Williams:

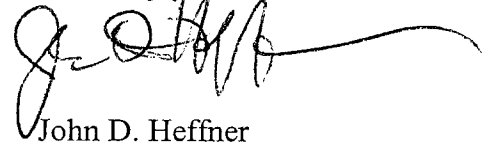
On behalf of San Pedro Railroad Operating Company (SPROC), a class III short line rail carrier, and pursuant to the Board's regulations at 49 CFR 1152.12, I am enclosing for filing in the above-captioned docket three copies of its System Diagram Map narrative.

Consistent with the Board's regulations, Applicant is simultaneously filing a copy of this narrative upon the Governor, the Arizona Corporation Commission, and the Arizona State Clearinghouse which is the designated state agency for the State of Arizona.

Applicant has satisfied the Board's publication and posting requirements and is enclosing three copies of its affidavit of service and publication along with attached newspaper publication notices.

Please date stamp and return one copy of this letter for our files.

Sincerely yours,



John D. Heffner

Enclosures:

cc: David Parkinson  
State agency parties

**NOTICE OF SAN PEDRO RAILROAD OPERATING COMPANY, LLC  
RAIL LINE CATEGORY 1 DESIGNATION**

**STB Docket No. AB-441 (Sub-No. 4X)**

In STB Docket No. AB-441 (Sub-No. 4X), San Pedro Railroad Operating Company, LLC (SPROC) has filed with the Surface Transportation Board ("STB") a narrative description of the following rail line which SPROC intends will be the subject of an abandonment or discontinuance application and/or abandonment or discontinuance petition for exemption to be filed within a three-year period following the date upon which the subject narrative is filed with the STB:

Line Description

1. Category: The rail lines that are the subject of this notice are to be designated as **Category 1** because they are planned to be the subject of an abandonment or discontinuance application or petition for exemption to be filed with the STB within three years of the date of the filing of this notice and narrative with the STB. See, 49 CFR §1152, et seq. (generally) and 49 CFR 1152 Subpart B (specifically).
2. Mileposts and Carrier's Designation for the lines:
  - (1) The subject lines include the line of railroad designated as the Bisbee Branch, which extends between milepost 1085.0 at Bisbee Junction, AZ, and milepost 1090.4 at Bisbee, AZ, a distance of 5.6 miles.<sup>1</sup>

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<sup>1</sup> There are some milepost discrepancies. SPROC is using the milepost designations utilized in connection with its acquisition of the subject rail properties in STB FD No. 34430, San Pedro Railroad Operating Company, LLC-Acquisition and Operation Exemption-SWKR Operating Company (decision served November 21, 2003) and the previous petition for abandonment of a portion of the subject rail properties, STB Docket AB-441 Sub-No. 3X, SWKR Operating Co.-Abandonment Exemption-In Cochise County, AZ (decisions served Dec. 17, 2003 and Nov. 4, 2003).

(2) The remaining line segments are collectively designated as the Douglas Branch and include the line of railroad extending between milepost 1097.3 near Paul Spur, AZ, and milepost 1106.5 near Douglas, AZ, a distance of 9.2 miles; the line of railroad extending between milepost 1055.8 near Charleston, AZ, and milepost 1097.3 near Paul Spur, AZ, a distance of 41.5 miles; and the line of railroad extending between milepost 1040.15 near Curtiss, AZ, and milepost 1055.8 near Charleston, AZ, a distance of 19.9 miles.<sup>2</sup>

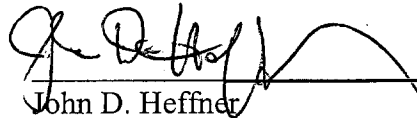
3. State in which the line is located: All segments are located in the state of Arizona.
4. Counties in which the line is located: All segments are located in Cochise County, AZ.
5. Agency or terminal stations located on the line: The only station through which business is received or forwarded is the company's office at Benson, AZ.

SPROC will, at reasonable cost, furnish upon request of any interested person a copy of the above-described narrative.

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<sup>2</sup> See, footnote 1. The milepost at Curtiss is alternatively identified as milepost 7.0. The milepost at Charleston is alternatively identified as milepost 26.9

Respectfully submitted, by

A handwritten signature in black ink, appearing to read 'John D. Heffner', is written over a horizontal line.

John D. Heffner  
John D. Heffner, PLLC  
1920 N Street, N.W.  
Suite 800  
Washington, D.C. 20036  
(202) 263-4180

Counsel for San Pedro Railroad Operating  
Company, LLC

Dated:

## PUBLIC NOTICE

### NOTICE OF SAN PEDRO RAILROAD OPERATING COMPANY, LLC RAIL LINE CATEGORY 1 DESIGNATION STB Docket No. AB-441 (Sub-No. 4X)

In STB Docket No. AB-441 (Sub-No. 4X), San Pedro Railroad Operating Company, LLC (SPROC) has filed with the Surface Transportation Board ("STB") a narrative description of the following rail line which SPROC intends will be the subject of an abandonment or discontinuance application and/or abandonment or discontinuance petition for exemption to be filed within a three-year period following the date upon which the subject narrative is filed with the STB:

#### Line Description

1. Category: The rail lines that are the subject of this notice are to be designated as **Category 1** because they are planned to be the subject of an abandonment or discontinuance application or petition for exemption to be filed with the STB within three years of the date of the filing of this notice and narrative with the STB. See 49 CFR §1152.61 (generally) and 49 CFR §1152 Subpart B (specifically).
2. Mileposts and Carrier's Designation for the lines:
  - (1) The subject lines include

the line of railroad designated as the Bisbee Branch, which extends between milepost 1085.0 at Bisbee Junction, AZ, and milepost 1090.4 at Bisbee, AZ, a distance of 5.6 miles.

- (2) The remaining line segments are collectively designated as the Douglas Branch and include the line of railroad extending between milepost 1097.3 near Paul Spur, AZ, and milepost 1106.5 near Douglas, AZ, a distance of 9.2 miles; the line of railroad extending between milepost 1055.8 near Charleston, AZ, and milepost 1097.3 near Paul Spur, AZ, a distance of 41.5 miles; and the line of railroad extending between milepost 1040.15 near Curtiss, AZ, and milepost 1055.8 near Charleston, AZ, a distance of 19.9 miles.

3. State in which the line is located: All segments are located in the state of Arizona.

4. Counties in which the line is located: All segments are located in Cochise County, AZ.

5. Agency or terminal stations located in the line: The only station through which business is received or forwarded is the company's office at Benson, AZ.

SPROC will, at reasonable cost, furnish upon request of any interested person a copy

of the above-described narrative.

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Counsel for San Pedro  
Railroad Operating Company,  
LLC

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2 See footnote 1. The milepost at Curtiss is alternatively identified as milepost 7.0. The milepost at Charleston is alternatively identified as milepost 26.9.

PUBLISH: March 29, 2005

**AFFIDAVIT OF SERVICE AND PUBLICATION**

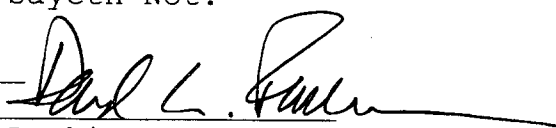
**OF**

**DAVID PARKINSON**

David Parkinson, being duly deposed and sworn states as follows:

On MARCH 29, 2005, on behalf of San Pedro Railroad Operating Company, LLC, I did cause to be published in a newspaper of general circulation in each county containing a Category 1 line [49 CFR 1152.10(b)(1)] a notice which included the information required to be published by a Class III railroad pursuant to 49 CFR 1152 Subpart B. Copies of such newspaper publication, and other proof of publication, are attached to this affidavit. Furthermore, I have served copies of the "Notice of San Pedro Railroad Operating Company, LLC - Rail Line Category 1 Designation" upon all parties designated in the Board's regulations at 49 CFR 1152.12 and have posted it as required by 49 CFR 1152.12(c)(2).

FURTHERMORE, Affiant Sayeth Not.

  
\_\_\_\_\_  
David Parkinson  
Owner  
San Pedro Railroad Operating Company,  
LLC

**AFFIDAVIT OF PUBLICATION**

STATE OF ARIZONA )  
COUNTY OF COCHISE )

KIMBERLY L. HECKS

being first

duly sworn, deposes and says: That (he) (she) is the Agent to the Publisher of the SIERRA VISTA HERALD and the BISBEE DAILY REVIEW newspapers printed and published six days a week in the County of Cochise, State of Arizona, and of general circulation in the cities of Sierra Vista and Bisbee, County of Cochise, State of Arizona and elsewhere, and the hereto attached

NOTICE OF SAN PEDRO  
RAILROAD OPERATING  
COMPANY, LLC RAIL  
LINE CATEGORY 1

STB DOCKET NO. AB-441  
was printed and published correctly in the regular and entire issue of said SIERRA VISTA  
HERALD and BISBEE DAILY REVIEW for

1 issues, that the first was  
made on the 29th day of MARCH 20 05  
and the last publication thereof was made on the 29th day of

MARCH 20 05 that said publication  
was made on each of the following dates, to wit:

03/29/05

Request of

**Sierra Vista Herald**  
**Bisbee Daily Review**

By

Subscribed sworn to before me this 29th day of MARCH  
20 05



Notary Public in and for the County of Cochise, State of Arizona

My Commission Expires:

5/21/08